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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:

FTX Trading Ltd., et al., Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**Emergency Motion by KaiKai Lin (Appearing Pro Se) to Confirm Entitlement to
September 30, 2025 Distribution and to Set Response Deadline**

The applicant, Kai-Kai Lin (hereinafter “Applicant”), appearing pro se, Account ID 94295605, Unique Customer Code 4297923, respectfully submits this emergency motion seeking relief to ensure the orderly execution of the September 30, 2025 distribution. Applicant has completed all required procedures prior to the registration deadline (including KYC verification, tax documentation submission, and DSP registration on the Kraken platform), and has received email confirmation from Debtor’s counsel Alexa J. Kranzley (kranzleya@sullcrom.com). Kraken DSP users holding Chinese passports and residing abroad who pay taxes overseas received confirmation emails around September 20, 2025 titled “FTX Liquidation Trust – Distribution to DSP Completed,” and their Kraken accounts reflect that FTX has transferred funds to Kraken. Despite multiple inquiries, Applicant has not received similar confirmation, and the personal bond claim page still shows a “Disputed” status, inconsistent with the statements made by Debtor’s counsel.

I. Relief Requested

1. Applicant requests that the Court order the FTX Liquidation Trust (“Trust”) to submit a notice by 12:00 PM (Eastern Time) on September 26, 2025, confirming whether Customer Code 4297923 is included in the September 30, 2025 distribution list via Kraken (Applicant’s selected DSP).

2. If the Trust fails to submit such notice by the deadline, or if no objections are filed by that time, Applicant requests that the Court approve this motion and order the Trust to include Customer Code 4297923 in the September 30, 2025 Kraken distribution list.

3. Applicant requests that the Court adjudicate this motion without a hearing, or alternatively, schedule the earliest possible hearing prior to September 30, 2025, or include this matter in the October 23, 2025 case status conference agenda.

II. Jurisdiction and Venue

4. This Court has jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334; venue is proper under 28 U.S.C. §§ 1408 – 1409. This matter constitutes a core proceeding under 28 U.S.C. § 157(b). Relief is authorized under 11 U.S.C. §§ 105(a), 1142(b), and the Court's inherent authority to enforce the confirmed plan.

III. Factual Background

5. Applicant is a Class 7A customer (Customer Code 4297923) and has selected Kraken as the DSP, with confirmation from Kraken (Exhibit A).

6. All distribution prerequisites (identity verification, tax documentation, Kraken account registration) have been completed (Exhibit B).

7. On August 20, 2025, Applicant emailed Debtor's counsel inquiring: "I have changed my place of residence but have not been able to get compensation. Have I met the necessary procedures? Please check and clarify whether I can get the allocation in September."

Counsel Alexa J. Kranzley replied on August 22, 2025: "We have reviewed the submitted materials and you have completed all of the pre-distribution requirements. Subject to final sanctions screening (which is done for all claims prior to distribution), you will be receiving a distribution on account of this claim on September 30, 2025." (Exhibit C)

8. The FTX Customer Claims Portal shows all steps completed, except Step 9 remains marked "Disputed" (Exhibit D).

9. Around September 20, 2025, similarly situated customers (Chinese passport holders / Hong Kong tax residents; Kraken as DSP) received emails titled "FTX Liquidation Trust – Distribution to DSP Completed," and their Kraken accounts reflect receipt of funds (Exhibit E).

10. Applicant has not received any similar confirmation. Multiple inquiries to FTX support and Trust counsel yielded only templated responses without substantive information (Exhibit F).

11. With the September 30 distribution imminent, a clear confirmation is needed to avoid exclusion of eligible creditors and ensure equal treatment.

12. This motion relates to Applicant's prior submission (Docket No. 31148), which the Court has included in the October 23, 2025 case status conference materials.

IV. Grounds for Relief and Urgency

13. The relief sought is procedural and narrowly tailored: it requests confirmation by a specific date that Applicant has met all distribution requirements.

14. Response deadline and CNO compliance: Applicant requests a response deadline of 12:00 PM ET on September 26, 2025, allowing the Court to issue an order approving the motion if no response is filed. Under local rules, a Certificate of No Objection (CNO) may be filed 24 hours after the objection deadline. If the Court requires a CNO, the September 26 deadline allows submission by September 27, still leaving sufficient time for adjudication before the September 30 distribution. To avoid prejudice from the 24-hour gap, Applicant respectfully requests that the Court approve the motion if no response is received by the deadline.

WHEREFORE, Applicant respectfully requests that the Court approve the proposed order attached hereto and grant such other relief as it deems just and proper.

Dated: September 24, 2025

Lin kaikai (pro se)

Kaikai Lin

Customer Code: 4297923

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX Trading Ltd., et al., Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

**ORDER GRANTING EMERGENCY MOTION TO CONFIRM INCLUSION IN THE
SEPTEMBER 30, 2025 DISTRIBUTION (CUSTOMER CODE 4297923) AND
SETTING DATE-CERTAIN RESPONSE DEADLINE**

Upon the motion (the "Motion") of Kaikai Lin (pro se), Customer Code 4297923; and good cause appearing; it is ORDERED that:

1. On or before September 26, 2025 at 12:00 p.m. Eastern Time, the FTX Recovery Trust (or its administrator) shall file a notice on the docket confirming whether Customer Code 4297923 is included in the September 30, 2025 distribution via Kraken.
2. If no such notice is filed by that deadline, or if no timely objection to the Motion is filed by that deadline, the Motion is DEEMED GRANTED and the FTX Recovery Trust is DIRECTED to include Customer Code 4297923 in the September 30, 2025 distribution via Kraken.
3. The Court retains jurisdiction to enforce and interpret this Order.

Dated: _____, 2025

Wilmington, Delaware

The Honorable Karen B. Owens

United States Bankruptcy Judge

CERTIFICATE OF SERVICE

RECEIVED
2025 SEP 24 AM 2:39

I hereby certify that on September __, 2025, I caused a true and correct copy of the foregoing Emergency Motion to be served via email on the following parties:

United States Trustee – District of Delaware:

Juliet M. Sarkessian (juliet.m.sarkessian@usdoj.gov)

Benjamin A. Hackman (benjamin.a.hackman@usdoj.gov)

David A. Gerardi (david.gerardi@usdoj.gov)

FTX Recovery Trust (Sullivan & Cromwell LLP):

Amanda S. Dietrich (dietericha@sullcrom.com)

James L. Bromley (bromleyj@sullcrom.com)

Brian D. Glueckstein (gluecksteinb@sullcrom.com)

Alexa J. Kranzley (kranzleya@sullcrom.com)

Delaware Counsel to the FTX Recovery Trust (Landis Rath & Cobb LLP):

Adam G. Landis (landis@lrclaw.com)

Kimberly A. Brown (brown@lrclaw.com)

Matthew R. Pierce (pierce@lrclaw.com)

Matthew B. McGuire (mcguire@lrclaw.com)

Request for Consent / Reservation: By this Certificate and the cover email, Movant requests that counsel confirm consent to service by email for the foregoing papers and any future papers in this case. If any counsel does not consent to service by email, Movant requests to be notified promptly so that alternative arrangements may be made.

Dated: September 24, 2025

Lin kaikai (pro se)

Kaikai Lin

Customer Code: 4297923

EXHIBIT INDEX

Exhibit A — Email (Kraken) confirming DSP onboarding (dated on/before Aug. 22, 2025)

Exhibit B — Screenshot of creditor claims portal showing completion of Steps 1–8

Exhibit C — Email correspondence between creditor and Debtor’s counsel

Exhibit D — FTX Claims Portal screenshots showing all steps completed (Step 9 still showing Disputed)

Exhibit E — Redacted copies/screenshots of other creditors’ “Completed Distribution to DSP” emails (received Sept. 20, 2025)

Exhibit F — Email threads to FTX support showing non-substantive/template responses

Exhibit A — Email (Kraken) confirming DSP onboarding (dated on/before Aug. 22, 2025)

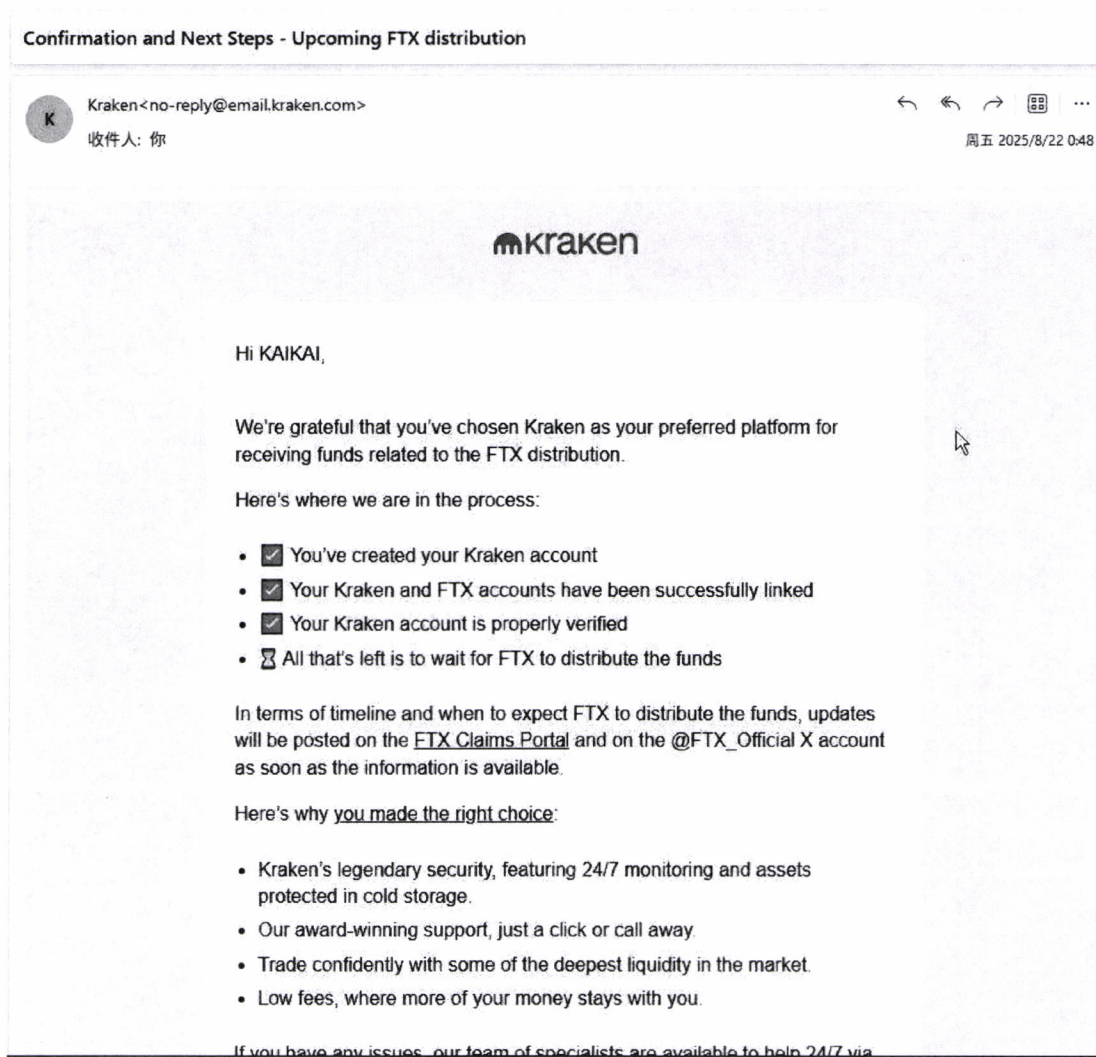


Exhibit B — Screenshot of creditor claims portal showing completion of Steps 1–8

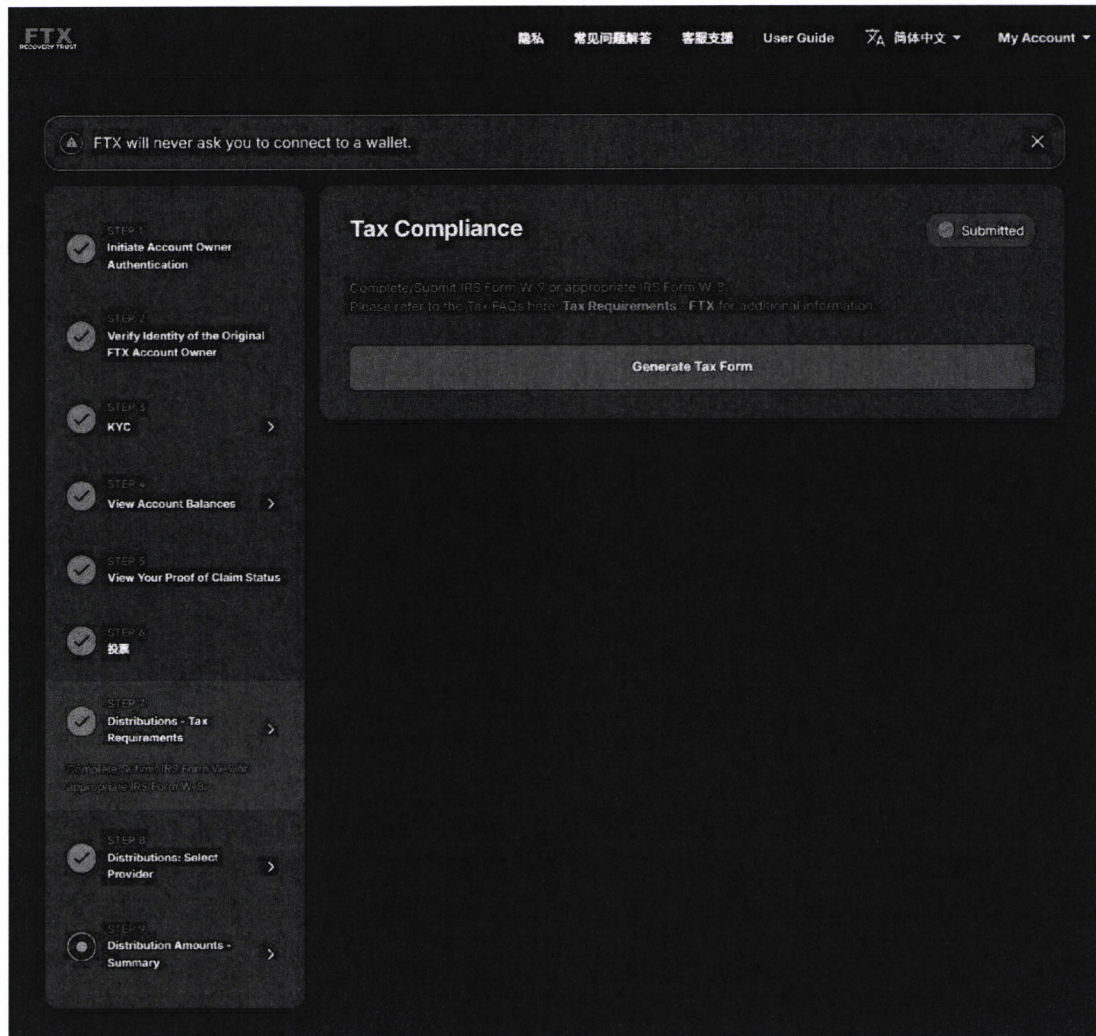


Exhibit C — Email correspondence between creditor and Debtor's counsel

Motion to Lift Payment Restrictions on Chinese Creditors and Ensure Equal Distribution Rights Under the FTX Reorganization Plan

DK Double K ← 答复 《 全部答复 → 转发 🗉 ...
 收件人: bromleyj@sullcrom.com; kranzleya@sullcrom.com; dietdericha@sullcrom.com; + 另外 7 人 周三 2025/8/20 10:14

🗉 翻译自 英语 显示原始邮件 打开自动翻译

I have changed my place of residence but have not been able to get compensation. Have I met the necessary procedures?
 Please check and clarify whether I can get the allocation in September.

...
 🗉 此翻译有帮助吗? 是 否

KJ Kranzley, Alexa J. <kranzleya@sullcrom.com> ← 《 → 🗉 ...
 收件人: 你; Bromley, James L; Dietderich, Andrew G; Glueckstein, Brian D; zzext-landis; zzExt-brown; zzext-pierce 周六 2025/8/23 4:42
 抄送: *FTXClaims

📧 你已在 周六 2025/9/20 6:14 答复

🗉 此消息的语言为 英语 翻译至 始终不翻译 英语

We have reviewed the submitted materials and you have completed all of the pre-distribution requirements. Subject to final sanctions screening (which is done for all claims prior to distribution), you will be receiving a distribution on account of this claim on September 30, 2025.

Alexa J. Kranzley
 +1 212 558 7893 (T) | +1 917 587 0849 (M)

...

Exhibit D — FTX Claims Portal screenshots showing all steps completed (Step 9 still showing Disputed)

FTX will never ask you to connect to a wallet.

STEP 1
Initiate Account Owner Authentication

STEP 2
Verify Identity of the Original FTX Account Owner

STEP 3
KYC

STEP 4
View Account Balances

STEP 5
View Your Proof of Claim Status

STEP 6
投票

STEP 7
Distributions - Tax Requirements

STEP 8
Distributions: Select Provider

STEP 9
Distribution Amounts - Summary

Distributions Dashboard

Values in U.S. Dollars (USD)

Sep 30th Distribution - Convenience Class Customers

Distribution Method	Kraken
Est. Distribution Date	TBD
Claim Classification	TBD
Claim Status	Disputed

Distribution Calculation

Claim Amount	TBD
Post-Petition Interest Distribution	TBD
(Tax Withholding)	TBD
(Forfeited Distribution)	TBD
Total Distribution	TBD
Recovery % (Prior to Tax Withholding)	TBD

The data above is static and pertains solely to the FTX Distribution on September 30, 2025. Any subsequent changes or updates (e.g., tax or distribution service provided) will be reflected in the Distributions Dashboard (Step 9) for the next distribution.

Exhibit E — Redacted copies/screenshots of other creditors' "Completed Distribution to DSP" emails (received Sept. 20, 2025)

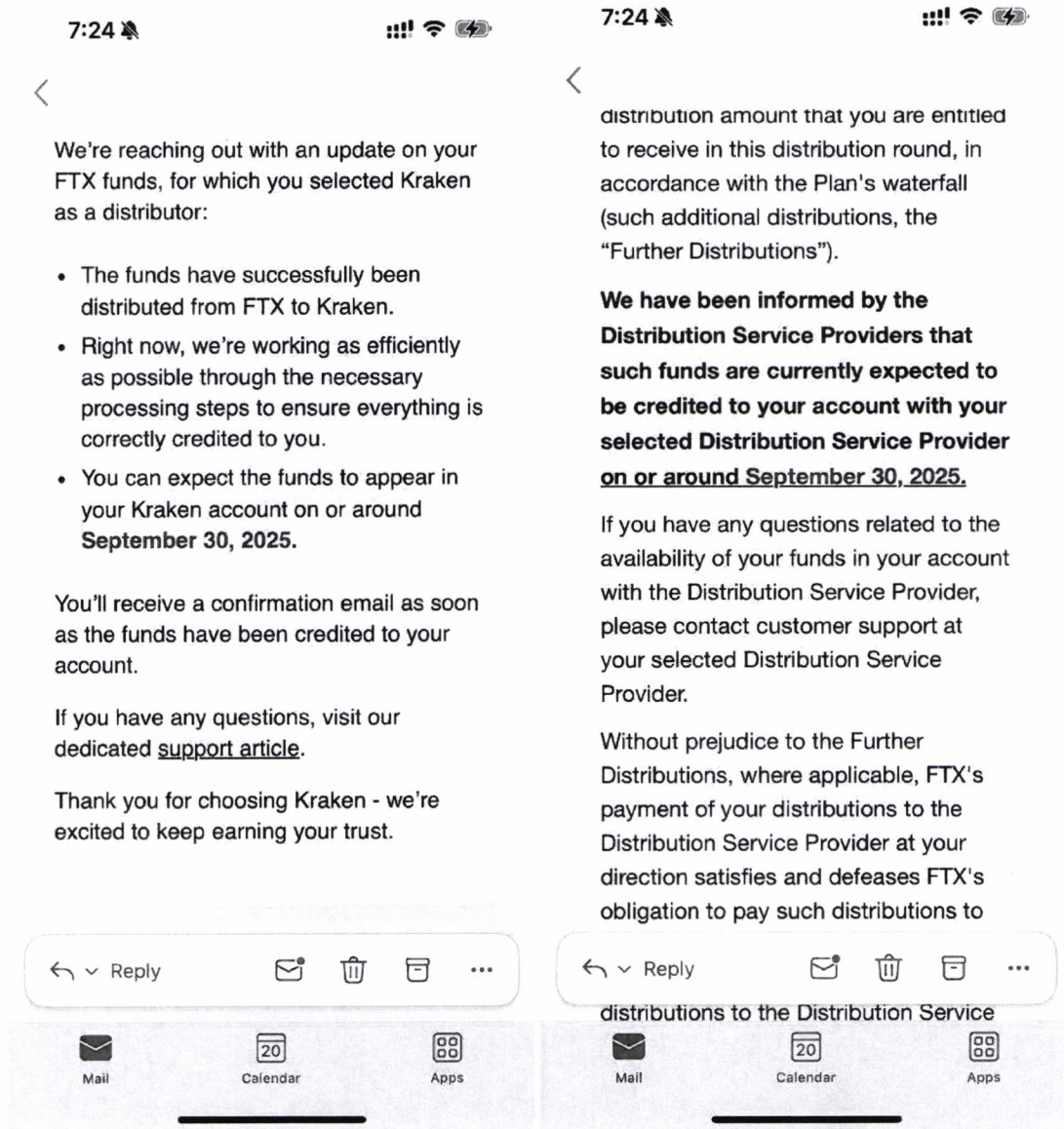


Exhibit F — Email threads to FTX support showing non-substantive/template responses

[Please use support.ftx.com] Re: I haven't received the notification regarding the distribution of creditor funds yet, while the other creditors have already received theirs.



Giorno (Please use support.ftx.com)

2025/9/20 GMT-7 10:56

Hi there,

Thanks for reaching out.

Please click on the "i" icon for more information as to why your claim status may be marked as "Disputed".

Why is my claim status Disputed?

Any Claim that is not "Allowed" (as defined in Section 2.1.8 of the Confirmed Second Amended Joint Chapter 11 Plan [D.I. 26404, Exhibit A] (the "Plan")) and is not subject to a valid and timely Bahamas Opt-In Election remains a "Disputed Claim" (as defined in the Plan). A Claim may be Disputed due to, among other reasons, the following:

- A proof of claim was filed is still under review and has not yet been reconciled;
- Your jurisdiction is still under review and/or is currently not eligible for distributions;
- You received partial distributions from the FTX Australia proceedings and are still under review to reconcile the remaining amount of your claim.

The confirmed FTX Chapter 11 Plan of Reorganization provides that unless "Allowed" in accordance with the Plan, all claims against the FTX Debtors remain "Disputed." The Plan further provides that the FTX Recovery Trust has until at least January 3, 2026 (one year after the Effective Date) to resolve and reconcile all Disputed Claims and, where necessary, to object to any such claims. The FTX Recovery Trust is currently in the process of reviewing and reconciling hundreds of thousands of claims.

To the extent that additional information is required in connection with the claim, either we, FTX Customer Support, or other professionals of the FTX Recovery Trust will reach out to discuss and to attempt to efficiently resolve any issues.

More information can be found here: <https://support.ftx.com/hc/en-us/articles/34522100742804-Distributions-Dashboard-FAQs>

Thank you,

Express

Extremely Urgent

LI FANGZHENG
(626) 426-7298
THE UPS STORE #7710
2224 AVENUE U
BROOKLYN NY 11229-3648

1 LBS 1 OF 1
SHIP WT: 1 LBS
DATE: 15, 12, 1
DATE: 23 SEP 2025

SHIP DELAWARE, US BANKRUPTCY COURT
TO: (302) 252-2900
CASE JUDGE KBO CLERK OF THE COURT
824 N MARKET ST

WILMINGTON DE 19801-3024



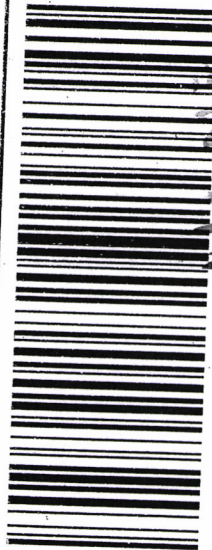
DE 197 9-25



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1

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